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*Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.,  
and Watch Tower Bible and Tract Society of Pennsylvania*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA )	Cause No. 1:20-cv-00052-SPW-TJC
MAPLEY, )	
Plaintiffs, )	<b>NOTICE OF APPEARANCE FOR</b>
vs. )	<b>DEFENDANTS WATCHTOWER</b>
WATCHTOWER BIBLE AND )	<b>BIBLE AND TRACT SOCIETY OF</b>
TRACT SOCIETY OF NEW YORK, )	<b>NEW YORK, INC., AND WATCH</b>
INC., WATCH TOWER BIBLE AND )	<b>TOWER BIBLE AND TRACT</b>
TRACT SOCIETY OF )	<b>SOCIETY OF PENNSYLVANIA,</b>
PENNSYLVANIA, and BRUCE )	<b>AND UNOPPOSED MOTION FOR</b>
MAPLEY SR., )	<b>EXTENSION OF TIME TO</b>
Defendants. )	<b>RESPOND TO COMPLAINT</b>

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NOTICE IS HEREBY GIVEN that attorneys Guy W. Rogers and Jon A. Wilson of the Brown Law Firm, P.C., 315 North 24<sup>th</sup> Street, P.O. Drawer 849, Billings, MT 59103-0849, Telephone: 406-248-2611 / Fax: 406-248-3128, will be acting as counsel of record for Defendants Watchtower Bible and Tract Society of New York, Inc. (hereinafter "Watchtower"), and Watch Tower Bible and Tract

Society of Pennsylvania (hereinafter “Watch Tower”). The undersigned has basically no information regarding the allegations asserted in Plaintiffs’ Complaint and Jury Demand (hereinafter “Complaint”) and needs additional time to consult with Watchtower and Watch Tower to formulate responses to the allegations in the Complaint. The undersigned recently contacted Plaintiffs’ counsel about the possibility of an extension until June 22, 2020, for Watchtower and Watch Tower to Answer or otherwise respond to the Complaint, and Plaintiffs’ counsel indicated no objection to such an extension. Watchtower and Watch Tower therefore respectfully requests an extension until June 22, 2020, to file an Answer or otherwise respond to the Complaint. By seeking this extension, Watchtower and Watch Tower do not waive any of the defenses under Rule 12(b), Fed.R.Civ.P., or any of the affirmative defenses under Rule 8(c), Fed.R.Civ.P., all of which are reserved. A proposed Order is submitted herewith for the Court’s consideration and convenience.

DATED this 20th day of May, 2020.

By: /s/ Guy W. Rogers

Guy W. Rogers

BROWN LAW FIRM, P.C.

*Attorneys for Defendants Watchtower  
Bible and Tract Society of New York,  
Inc., and Watch Tower Bible and  
Tract Society of Pennsylvania*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 20, 2020, a copy of the foregoing was served on the following person(s):

1. U.S. District Court, Billings Division
2. Robert L. Stepan  
Ryan R. Shaffer  
James C. Murnion  
MEYER, SHAFFER & STEPANS, PLLP  
430 Ryman Street  
Missoula, MT 59802

by the following means:

<u>1, 2</u> CM/ECF	<u>      </u> Fax
<u>      </u> Hand Delivery	<u>      </u> E-Mail
<u>      </u> U.S. Mail	<u>      </u> Overnight Delivery Services

By: /s/ Guy W. Rogers  
Guy W. Rogers  
BROWN LAW FIRM, P.C.  
*Attorneys for Defendants Watchtower  
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Tract Society of Pennsylvania*